

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

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I, William J. Rose, being duly sworn, deposes and states as follows:

8:51 am, Jan 15 2025

**INTRODUCTION AND BACKGROUND**

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY \_\_\_\_\_ Deputy

1. I am a Special Agent with the United States Department of Agriculture, Office of Inspector General (the “USDA-OIG”), where I have served since July 3, 2022. I am currently assigned to the USDA-OIG Beltsville, Maryland Sub-Office. Before joining USDA-OIG, I was a Special Agent with the United States Secret Service (“USSS”) where I received training related to financial investigations, money laundering, identity theft, and protective intelligence investigations. While I was a Special Agent, I received training regarding the application for and execution of both search and arrest warrants. I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center, as well as the Special Agent Training Course through the USSS. In my current assignment, I have participated in or conducted numerous investigations involving illegal activity, including fraud to USDA and other federal programs, theft of government funds, wire fraud, and money laundering. I have assisted and/or participated in the preparation and/or execution of multiple search and arrest warrants. As a federal law enforcement officer, I am authorized to execute search and seizure warrants issued under Rule 41 of the F.R.C.P.

2. I am considered an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7), in that I am empowered by the law to conduct investigations of, and to make arrests for, offences enumerated in Title 18, United States Code, Section 2516.

3. I submit this affidavit in support of a criminal complaint and arrest warrants for Maria-Roza TOMESCU (hereinafter “M.TOMESCU”), Ana Maria TOMESCU (hereafter “A.TOMESCU”), and Fabritio SARDARU (hereafter “SARDARU”).

4. Based on the facts in this affidavit, I respectfully submit that there is probable cause to believe that M.TOMESCU, A.TOMESCU, and SARDARU violated the following offenses: Conspiracy to Commit Wire Fraud, in violation of 18 U.S.C § 1349; Supplemental Nutrition Assistance Program (SNAP) Benefit Fraud, in violation of 7 U.S.C § 2024(b); and Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A (the “SUBJECT OFFENSES”)

5. This affidavit is based upon my participation in the investigation, my examination of reports and records, and my conversations with other law enforcement agents and other individuals. Because this affidavit is being submitted for the limited purpose of obtaining a criminal complaint, it does not include all the facts that I have learned during this investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Information in this affidavit does not only set forth my personal observations, but rather at times, reflects information from reports, as well as information provided to me by other law enforcement agents who observed events described and to whom I have spoken or whose reports I have read.

**SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)**

7. SNAP, formerly known as the Food Stamp Program, is a federally funded, national program established by the United States to alleviate hunger and malnutrition among lower income families. The USDA, an agency of the United States, administers SNAP through the Food and Nutrition Service (“FNS”). FNS is responsible for the authorization and disqualification of retail food establishments participating in the redemption of SNAP benefits. Social service agencies from each state share responsibility with FNS for administration of the program through authorization and revocation of individual SNAP benefit recipients. In Maryland, the SNAP

program is administered by the Department of Human Services (“DHS”). Benefits dispensed under SNAP are the property of the USDA.

8. Between 1939 and 2001, Food-Stamp Program beneficiaries were issued paper coupons, or food stamps, as a way to acquire low or no cost food for themselves and their families. In 2001, the program transitioned from the paper coupon system to the current electronic system of access devices to distribute SNAP benefits. Today, SNAP benefits are loaded onto electronic benefit transfer (“EBT”) cards similar to commercial debit cards and each recipient establishes a unique four-digit pin that is required to be imputed every time they use their card. In Maryland, the EBT card is known as an Independence Card. EBT cards have personal identifying information and other data concerning the applicant stored on them electronically.

9. Each month, EBT cards are automatically credited with the appropriate level of food stamp benefits for each SNAP recipient in order to subsidize food purchases at participating supermarkets, convenience stores, and other food retailers. The balance of an EBT card may be ascertained by calling a customer service phone line, which is typically printed on the back of EBT cards. This process is also known as a balance inquiry.

### **PROBABLE CAUSE**

10. In August 2022, the Maryland Department of Human Services, Office of Inspector General (“DHS-OIG”) met with USDA-OIG to request assistance investigating numerous incidents of unknown individuals compromising the EBT cards of Maryland residents and stealing the SNAP benefits via large purchases at retail businesses in the State of Maryland and elsewhere. At the time of this meeting, Maryland DHS-OIG provided USDA-OIG with data of compromised Maryland EBT card transactions and estimated the financial loss to Maryland EBT recipients and

the SNAP program to be approximately \$298,000. Since then, the financial loss, to the Maryland SNAP recipients, has risen dramatically and is currently estimated at over \$19 million dollars.

11. On July 21, 2022, a traffic stop conducted by the Montgomery County Police Department (“MCPD”). The driver was identified by his Irish passport card and Romanian identification card as SARDARU, and the passenger was identified as a close relative of SARDARU’s.<sup>1</sup> The passenger will be hereafter identified as JUVENILE-1. During the stop and through subsequent investigation, MCPD investigators learned that SARDARU and the passenger used cloned EBT cards to make numerous large purchases of baby formula. MCPD investigators provided USDA-OIG copies of the retail store surveillance video, police reports, and photographs from the July 21, 2022, traffic stop.

12. A review of the provided photographs revealed the following photographs of SARDARU and SARDARU’S Irish passport card photograph that he presented to MCPD:



13. During the traffic stop, MCPD officers recovered numerous receipts from retail stores visited on July 21, 2022, prior to the traffic stop. Most receipts were from purchases in

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<sup>1</sup> The identity of the second subject, though known to law enforcement, is being omitted due to the subject being a minor.

Maryland, in Montgomery and Howard Counties. The receipts revealed that most of the purchases were for baby formula and from three separate EBT cards. USDA-OIG conducted research of the SNAP transactions using USDA investigative databases. The research revealed that the three EBT cards numbers were associated with California EBT accounts each belonging to three different California SNAP recipients: Victim MS, Victim MB, and Victim FA.

14. The following chart reflects the purchases made with the California EBT card information for the three victims:

DATE AND TIME	STORE	LOCATION	EBT CARD USED	AMOUNT
July 21, 2022 at 12:08pm	LA Mart	Columbia, MD	Victim FA EBT card x7364	\$1,349.46
July 21, 2022 at 12:22pm	LA Mart	Columbia, MD	Victim FA EBT card x7364	\$1,349.46
July 21, 2022 at 1:26pm	Lotte Plaza	Rockville, MD	Victim FA EBT card x7364	\$1004.18
July 21, 2022 at 1:37pm	Lotte Plaza	Rockville, MD	Victim FA EBT card x7364	\$2,149.20
July 21, 2022 at 2:13pm	Giant Food	Bethesda, MD	Victim FA EBT card x7364	\$1,258.20
July 21, 2022 at 2:43pm	Giant Food	Potomac, MD	Victim FA EBT card x7364	\$182.90
July 21, 2022 at 2:42pm	Giant Food	Potomac, MD	Victim MB EBT card x1085	\$676.67
July 21, 2022 at 2:51pm	CVS #1449	Potomac, MD	Victim MS EBT card x1214	\$430.00
July 21, 2022 at 3:16pm	Giant Food	Potomac, MD	Victim MS EBT card x1214	\$123.61
July 21, 2022 at 4:09pm	Giant Food	Silver Spring, MD	Victim MS EBT card x1214	\$123.61
July 21, 2022 at 4:12pm	Giant Food	Silver Spring, MD	Victim MS EBT card x1214	\$122.74
			<b>TOTAL</b>	<b>\$8,770.03</b>

15. The following photograph is a surveillance photograph, from Giant Food in Silver Spring, MD, showing SARDARU leaving the store after using Victim MS' CA EBT card x1214 to purchase baby formula.



16. All three California SNAP victims were contacted by investigators involved in this case. Each victim informed investigators that they were in possession of their EBT card and did not make the SNAP purchases in Maryland. They each further advised that they had not traveled to Maryland and did not give anyone permission to use their EBT cards.

17. As a result of the traffic stop, approximately 353 cans of baby formula were recovered by MCPD as shown in the following photograph:



18. During USDA-OIG investigative database research, a review of balance inquiry records was conducted on the three EBT cards. The records revealed that phone number (714) 933-5354 was used to conduct balance inquiries on each card on the following date and times:<sup>2</sup>

- a. July 21, 2022 at 8:23am (PDT) - Victim FA EBT card x7364
- b. July 21, 2022 at 8:24am (PDT) - Victim MB EBT card x1085
- c. July 21, 2022 at 8:25am (PDT) - Victim MS EBT card x1214

19. A law enforcement database check revealed phone number (714) 933-5354 was assigned to T-Mobile.

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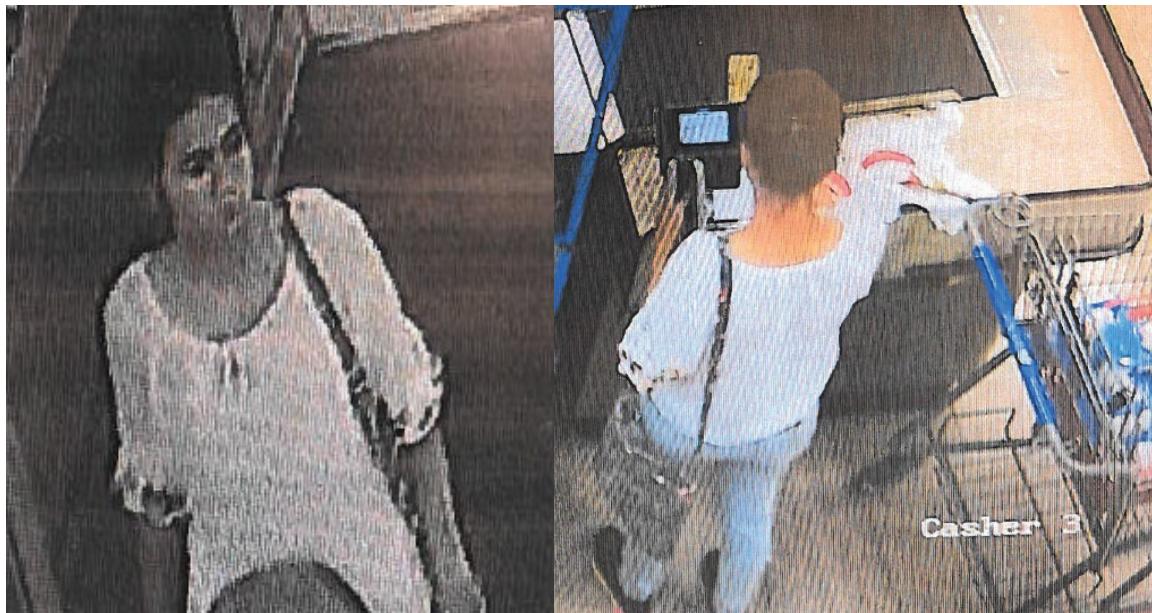
<sup>2</sup> The times reflect Pacific Standard Time (PDT) because the USDA database shows transactional data in the time zone associated with the EBT card state which for these three EBT cards is California. The time when converted to eastern time will be three hours later than the database time reflected.

20. T-Mobile business records were later obtained which revealed that this phone number was registered to an Ana Maria Tomescu (A. TOMESCU) with a birth date of September 10, 1988, and a listed address in Kent, Washington.

21. On or about August 25, 2022, USDA-OIG conducted a follow-up regarding the purchases that SARDARU made at Lotte Plaza Market in Rockville, MD to determine if there were surveillance photographs of the purchases. A USDA-OIG investigator met with Witness 1, a Lotte Plaza Market Store manager, who advised that he was aware of the fraudulent SNAP purchases that occurred on July 21, 2022, and provided surveillance photographs and receipts related to the purchases. A review of the surveillance photographs showed SARDARU and his close relative making the purchases.

22. Witness 1 also told the USDA-OIG investigator that he had had several recent calls from SNAP fraud victims and law enforcement regarding unauthorized SNAP purchases at their store. Witness 1 provided additional photographs and receipts related to two separate individuals involved in reported unauthorized SNAP fraud purchases that occurred on July 8, 2022.

23. A review of the additional surveillance photographs depicted what appeared to be a white female with a white shirt, blue jeans, dark shoes, a grayish purse with a floral pattern, and a grayish wallet where she held the EBT cards she used. The following images are from the copies of the photographs of the adult female provided by Witness 1:



24. A review of the photos of the second subject appeared to be a white male, possibly a minor, with a white shirt, black hair, a white shirt with the word “adidas”, and light in color shorts.

25. A review of the receipts revealed the female and male utilized EBT card data from three separate EBT cards resulting in a payment of \$2,188.94 in SNAP benefits. USDA-OIG conducted research on the three EBT cards, using USDA investigative databases, revealing two of the EBT cards belonged to two Kentucky SNAP recipients and the third card belonged to a Maryland SNAP recipient. The following chart depicts the SNAP transactions and the related victim EBT cards used:

DATE AND TIME	STORE	LOCATION	EBT CARD USED	AMOUNT
July 8, 2022 at 12:18pm	Lotte Plaza	Rockville, MD	KY Victim ADT EBT card x0780	\$629.70
July 8, 2022 at 12:27pm	Lotte Plaza	Rockville, MD	KY Victim SD EBT card x2470	\$739.64
July 8, 2022 at 4:22pm	Lotte Plaza	Rockville, MD	KY Victim SD EBT card x2470	\$448.07
July 8, 2022 at 4:22pm	Lotte Plaza	Rockville, MD	MD Victim DV EBT card x1387	\$371.53
			<b>TOTAL:</b>	<b>\$2,188.94</b>

26. USDA-OIG later interviewed the two Kentucky SNAP recipients, Victim ADT and Victim SD confirmed they had possession of their EBT cards, they did not travel to Maryland, and they did not conduct any SNAP purchases in Maryland.

27. On or about August 27, 2022, the USDA-OIG investigator who obtained the surveillance photographs, from Lotte Plaza, was at the Sam's Club store located at 424 George Clauss Boulevard in Severn, MD when they observed a white female that resembled the white female depicted in the Lotte Plaza surveillance photographs. The white female was wearing a purse with a floral pattern and holding a grayish in color wallet similar to the female at Lotte Plaza. The female placed several cases of Red Bull energy drink into her shopping card and proceeded to the self-checkout lane to purchase the items. The following photograph was taken by the USDA-OIG agent while the female was making the purchases:



28. The USDA-OIG agent observed the white female exit the Sam's Club and load the cases of Red Bull into a White Toyota minivan with California registration 7VXY740. A law enforcement database check was later conducted on the vehicle tag which revealed the following:

- a. Vehicle: 2012 Toyota Sienna Minivan
- b. Registered owner: Ana Maria Tomescu
- c. Listed address in Tustin, California.

29. The USDA-OIG agent met with Witness 2, a Sam's Club Store manager, regarding the Red Bull purchase. Witness 2 stated they had observed the purchase due to large amount of Red Bull and that the Sam's Club account used to make the purchase had been reported several times for stolen EBT cards being used with the account. Witness 2 looked up the purchase receipt and allowed the investigator to take a photograph of the receipt.

30. A review of the receipt revealed two EBT cards used to make the purchases and a total purchase amount of \$702.62.

31. USDA-OIG later researched the transactions, using USDA-OIG investigative databases, revealing the EBT card data used from the two cards belonged to two Maryland SNAP recipients. The following chart shows the transactions and associated Maryland EBT cards:

DATE AND TIME	STORE	LOCATION	EBT CARD USED	AMOUNT
August 27, 2022 at 4:38pm	Sam's Club	Severn, MD	Victim AS MD EBT card x7302	\$317.86
August 27, 2022 at 4:36pm	Sam's Club	Severn, MD	Victim CH MD EBT card x1900	\$384.76

32. During the course of the investigation, USDA-OIG learned from MD DHS-OIG that on or about September 1, 2022, MD Victim AS reported unauthorized SNAP transactions occurring on their MD EBT card ending in x7302. MD DHS-OIG also provided information that,

on or about February 21, 2023, MD Victim CH also reported unauthorized SNAP transactions occurring on their MD EBT card ending in x1900.

33. Witness 2 also identified the name on the Sam's Club membership as "Alex Popescu" and the membership number as 10110467343276.

34. A driver's license check was later conducted which revealed A. TOMESCU had drivers' licenses in California and Washington State. Drivers' license photographs were obtained for both licenses which appeared to show the same female in each license photograph as shown in the following images:



35. A criminal history check was also conducted which revealed that A. TOMESCU is a Romanian citizen.

36. Sam's Club business records were obtained related to the Sam's Club membership account 10110467343276 with the name "Alex Popescu." A review of the records revealed the following:

- a. Name: Alex Popescu
- b. Date of Birth: March 14, 2000
- c. Phone: 657-346-7070
- d. Email: Sparta.s@icloud.com

e. Joined: June 16, 2022

37. The records also revealed this account was opened at the Sam's Club #6434 located at 3535 Russett Green E. in Laurel, MD.

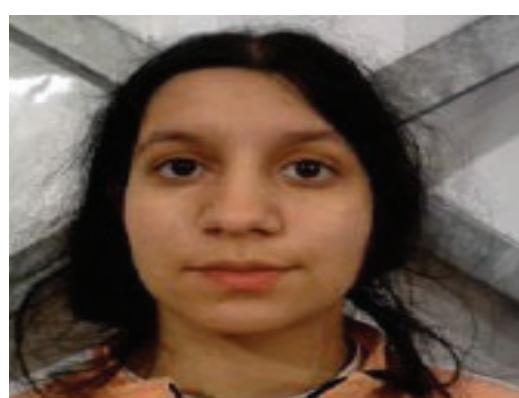
38. A review of the purchase records, associated with this account, revealed approximately 267 different EBT cards were used to make purchases using this account from June 16, 2022, to at least June 20, 2023, in Maryland and elsewhere. The EBT cards were associated with 9 different states including Maryland resulting in the fraudulent use of approximately \$215,978 in SNAP benefits.

39. USDA-OIG obtained assistance from Homeland Security Investigations (HSI) to provide background information on A.TOMESCU and her associates. HSI provided the identification information and photographs of A.TOMESCU and the following family members:

a. Maria Roza Tomescu (M.TOMESCU), who is 20 years old and was identified as A.TOMESCU.

b. A.TOMESCU'S son who is a juvenile

40. The following HSI provided photograph depicts M.TOMESCU:



41. During the course of this investigation, USDA-OIG was notified by Howard County Police Department that on or about December 31, 2023, the Baltimore County Police Department ("BCPD") arrested M. TOMESCU for an offense unrelated to the USDA-OIG

investigation. USDA-OIG obtained the BCPD body camera footage for the arrest. A review of the footage revealed it matched the photograph of M. TOMESCU previously provided by HSI. The following photograph is a screen shot from the provided body camera footage:



42. USDA-OIG compared the photograph of A.TOMESCU'S son to the photograph captured when the Sam's Club "Alex Popescu" membership was created. The subject in the Sam's Club membership photograph appeared to match the photograph of A.TOMESCU'S juvenile son.<sup>3</sup>

43. Additional database checks for law enforcement contact with "Alex Popescu," revealed an October 31, 2022 traffic stop conducted by the Anne Arundel County Police Department (AACPD). Officers stopped A.TOMESCU'S 2012 White Toyota Van bearing California registration 7VXY740 and the driver was listed as "Alex Popescu."

44. USDA-OIG obtained the AACPD body camera footage related to this traffic stop. A review of the body camera footage revealed the driver to be A.TOMESCU'S juvenile son, who provided the officer with what appeared to be a Romanian license, stated that his name was "Alex Popescu," and claimed he was 22 years old. He further stated his date of birth of March 14, 2000.

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<sup>3</sup> The images of A.TOMESCU'S son are being omitted due to him being a juvenile

45. Based on records previously provided by HSI, USDA-OIG has probable cause to believe A.TOMESCU'S juvenile son provided false identifying information to the AACPD officer during the traffic stop, and also used this false information to open the "Alex Popescu" Sam's Club membership.

46. A review of surveillance photographs obtained related to the individuals making EBT card purchases, using the "Alex Popescu" Sam's Club membership account, revealed several photographs of A.TOMESCU, M.TOMESCU, and A.TOMESCU'S juvenile son conducting purchases on the account.

47. The following chart and surveillance photographs depict transactions by M.TOMESCU, and A.TOMESCU at various Sam's Club Stores in Maryland:

DATE AND TIME	STORE	LOCATION	EBT CARD USED	AMOUNT
June 17, 2022 at 4:12pm	Sam's Club	Severn, MD	CA Victim CA EBT x8560	\$1,000
August 8, 2022, at 2:21pm	Sam's Club	Catonsville, MD	CA Victim DJR x4240	\$781.54
August 27, 2022 at 3:32pm	Sam's Club	Severn, MD	MD Victim KM EBT x9835 <sup>4</sup>	\$924.50

a. M.TOMESCU's SNAP Purchase on June 17, 2022, at Sam's Club in Severn, Maryland

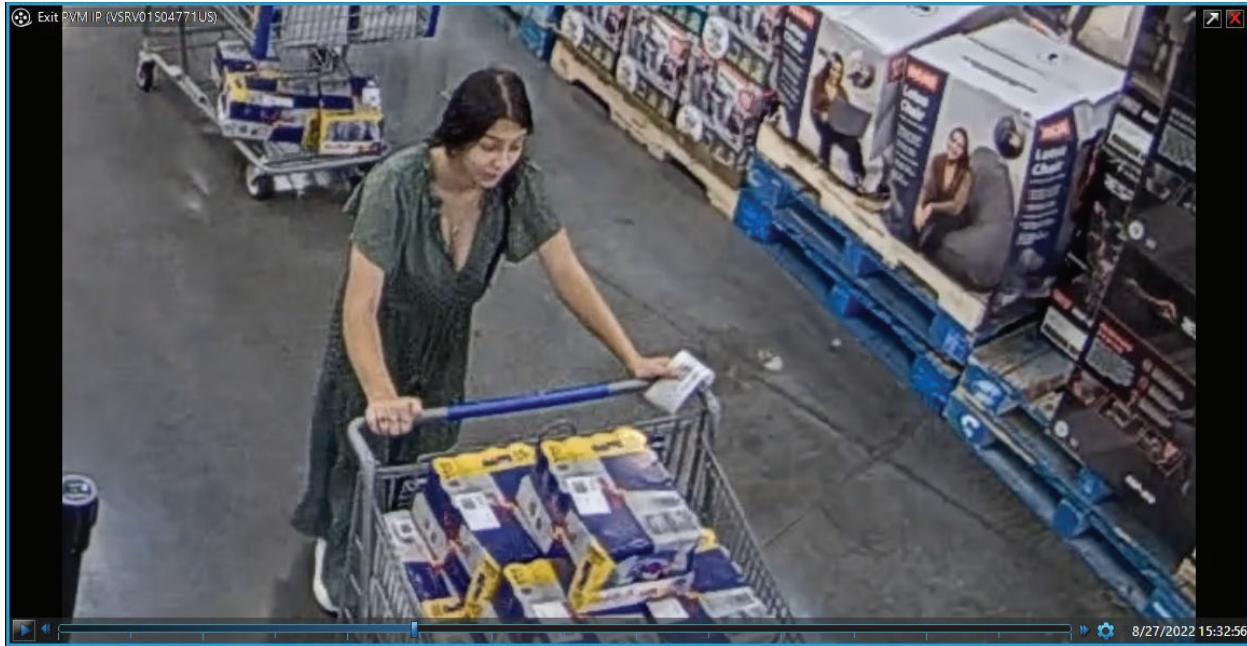


<sup>4</sup> USDA-OIG was notified by DHS-OIG that on or about September 7, 2022, Maryland Victim KM reported unauthorized SNAP transactions occurring on their MD EBT card ending in x9835.

b. M.TOMESCU's SNAP Purchase on August 8, 2022, at the Sam's Club in Catonsville, Maryland:



c. M. TOMESCU'S SNAP Purchase on August 27, 2022, at Sam's Club in Severn, Maryland



#### **IDENTIFICATION OF “ALEX POPESCU” BJ’S WHOLESALE CLUB ACCOUNT**

48. USDA-OIG conducted additional USDA investigative database research on Kentucky Victim ADT’S EBT card ending x0780 which revealed the card was used on August 3, 2022 to conduct three SNAP transactions totaling \$639.39. The transactions occurred at the BJ’s Wholesale Club located at 8139 Governor Richie Highway in Pasadena, MD.

49. On or about September 29, 2022, A USDA-OIG investigator visited the BJ’s Wholesale Club, in Pasadena, MD, and spoke to Witness 3, a loss prevention manager, regarding the fraudulent SNAP transactions that occurred on August 3, 2022. Witness 3 researched the transactions and provided the USDA-OIG investigator with a copy of the transaction receipt for two of the three SNAP transactions conducted. A review of the receipt identified the BJ’s Membership number as 05945628034, and Witness 3 stated the name used on the membership was “Alex Popescu.”

50. Witness 3 also provided surveillance photographs of the individuals who conducted the SNAP transactions, which revealed the transactions were conducted by A.TOMESCU'S juvenile son and a female, as depicted in the following photograph:



51. USDA-OIG obtained business records for the "Alex Popescu" BJ's Wholesale Club membership which revealed the following:

- a. Account: 05945628034
- b. Name: Alex Popescu
- c. Phone: 657-346-7070
- d. Enrolled: June 17, 2022
- e. Location enrolled: Club 059 (BJ's Pasadena, MD)
- f. Total Sales: \$128,357.97

52. USDA-OIG conducted additional analysis of the account which revealed approximately 241 different EBT cards were used to make purchases using this account from June 17, 2022, to at least September 5, 2022, in Maryland and elsewhere. The EBT cards were associated with 9 different states, including Maryland, resulting in a total loss of approximately \$128,308 in SNAP benefits.

53. During the course of the investigation, a USDA-OIG agent, based in Kentucky, received reports from the Kentucky Cabinet for Health and Family Services (CHFS), Office of Inspector General (OIG) regarding reports of numerous Kentucky SNAP recipients' benefits being illegally used in Maryland. The Kentucky USDA-OIG agent identified numerous Kentucky SNAP benefit EBT cards being used at Sam's Clubs and other stores in Maryland. The USDA-OIG agent obtained balance inquiry records related to the fraudulent transactions identified which revealed several phone numbers frequently used to make balance inquiries on many of the Kentucky SNAP recipient's cards.

54. During the review of the Kentucky balance inquiry records provided, the EBT cards for Victim ADT and Victim SD, the two Kentucky SNAP recipients referenced in paragraph 27 were listed. The balance inquiry records showed the following two phone numbers, which also were used to conduct balance inquiries on other cards, on the list:

- a. 510-458-6921
- b. 714-933-5354

55. 714-933-5354 is the same phone number referenced in paragraphs 20 thru 22 as belonging to A.TOMESCU, and being used to conduct balance inquiries on the three California SNAP recipient cards used by SARDARU to make illegal SNAP purchases on July 21, 2022.

56. A law enforcement database check was conducted on phone number 510-458-6921, revealing it belonged to T-Mobile.

57. T-Mobile records were obtained for phone number 510-458-6921, further revealing the phone number was a pre-paid T-Mobile account without a subscriber name listed.

58. A review of the T-Mobile call detail records revealed this number had at least 47 communications with the number 657-346-7070 listed on the “Alex Popescu” accounts between June 2022 and October 2022. The records also revealed that this phone number had approximately 409 calls and/or text communications with A.TOMESCU’S phone number, 714-933-5354, between June 2022 and August 2022.

59. Another phone number that the call detail records showed as communicating frequently with 510-458-6921 was 714-933-8170. This phone number was also listed numerous times in the balance inquiry data provided by the Kentucky USDA-OIG agent. The T-Mobile call detail records revealed that 510-458-6921 had approximately 860 calls and/or text communications with 714-933-8170 between July 2022 and October 2022.

60. T-Mobile business records were obtained for 714-933-8170, revealing it also belonged to A.TOMESCU.

61. Bank of America business records were later obtained for accounts belonging to A.TOMESCU and V.TOMESCU. A review of the account holder information associated with V.TOMESCU’S Bank of America account revealed his checking account was opened on May 25, 2022 and the phone number listed on the account was 510-458-6921.

62. Based on my training, experience and conversations with other USDA-OIG agents involved in this investigation, I know that the companies Conduent and Fidelity Information Services (FIS) contract with a majority of the States to manage the administration of SNAP

benefits, balance inquiry servicing, and provide payment solution services such as SNAP retailer payment redemptions. I also know that neither Conduent nor FIS have servers in Maryland.

63. In Maryland, Conduent is the company that is contracted to provide these services.

64. Balance inquiry business records were obtained from Conduent and FIS related to the phone numbers 714-933-8170, 714-933-5354, and 657-346-7070.

65. The balance inquiry records revealed the following:

- a. The phone numbers 714-933-8170 and 714-933-5354, linked to A.TOMESCU, conducted at least 4,397 balance inquiry calls on EBT cards from 17 different states including Maryland between February 2022 and April 2023.
- b. A.TOMESCU'S son's phone number 657-346-7070 conducted at least 142 balance inquiry calls on EBT cards from 8 different states including Maryland between January 2022 and September 2022.

66. USDA-OIG conducted an analysis of balance inquiry records and EBT cards used on the two "Alex Popescu" accounts which revealed several cards that balance inquiries were conducted on were used to make purchases on one or both of the "Alex Popescu" accounts.

67. On or about July 19, 2023, a Walmart Global Investigations (WGI) investigator, contacted USDA-OIG to make a notification regarding recent usage of the Sam's Club "Alex Popescu account" at the Sam's Club located at in Salt Lake City, Utah. The usage occurred on July 18, 2023. The WGI investigator advised that no EBT purchases were made but the individuals that used the account renewed the "Alex Popescu account" membership. The WGI investigator also provided USDA-OIG with surveillance photographs of the individuals that renewed the membership.

68. A review of the provided surveillance photographs revealed A. TOMESCU's minor son, SARDARU, and two females were the individuals that renewed the membership at the Sam's Club in Salt Lake City, Utah. The following image depicts an overview of the individuals and the frontal image of SARDARU in the Sam's Club:



69. Based on the forgoing facts, the described conduct has resulted in the illegal use of approximately 497 difference EBT cards associated with SNAP Recipient EBT card information from at least 9 different states to include Maryland. This has resulted in a combined total of approximately \$355,271.19 in SNAP benefits being illegally used to conduct purchases in Maryland and elsewhere. Of this SNAP benefit amount approximately \$88,457 was spent in the State of Maryland.

### **CONCLUSION**

70. Based upon the foregoing, I respectfully submit that there is probable cause that Ana Maria TOMESCU, Maria Roza TOMESCU, and Fabritio SARDARU committed the SUBJECT OFFENSES and that there is probable cause to issue the requested criminal complaint.

Respectfully submitted,

*William Rose*

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William J. Rose  
Special Agent  
USDA-OIG

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this 14th day of January 2025:

*A. David Copperthite*

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A. David Copperthite  
United States Magistrate Judge  
District of Maryland

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